

1 COOLEY LLP  
MICHAEL A. ATTANASIO (151529)  
2 (mattanasio@cooley.com)  
BENEDICT Y. HUR (224018)  
3 (bhur@cooley.com)  
SIMONA AGNOLUCCI (246943)  
4 (sagnolucci@cooley.com)  
EDUARDO E. SANTACANA (281668)  
5 (esantacana@cooley.com)  
ARGEMIRA FLOREZ (331153)  
6 (aflorez@cooley.com)  
NAIARA TOKER (346145)  
7 (ntoker@cooley.com)  
HARRIS MATEEN (335593)  
8 (hmateen@cooley.com)  
THILINI CHANDRASEKERA (333672)  
9 (tchandrasedkera@cooley.com)  
ISABELLA MCKINLEY CORBO (346226)  
10 (icorbo@cooley.com)  
CHELSEA HU (357212)  
11 (chu@cooley.com)  
3 Embarcadero Center, 20th Floor  
12 San Francisco, CA 94111-4004  
Telephone: (415) 693-2000  
13 Facsimile: (415) 693-2222

14 Attorneys for Defendant  
GOOGLE LLC

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

20 ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

21 Plaintiffs,

22 v.

23 GOOGLE LLC,

24 Defendant.

Case No. 3:20-CV-04688-RS

**DECLARATION OF CHELSEA HU IN  
SUPPORT OF GOOGLE LLC'S OPPOSITION  
TO PLAINTIFFS' MOTION IN LIMINE NO. 10  
TO PRECLUDE GOOGLE FROM CALLING  
REBUTTAL EXPERT DONNA L. HOFFMAN**

Dept: 3, 17<sup>th</sup> Fl.  
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020  
Trial Date: August 18, 2025

1 I, Chelsea Hu, hereby declare as follows:

2 1. I am an associate with the law firm Cooley LLP and am counsel for Defendant  
3 Google LLC in the above captioned action. I am duly licensed to practice law in the state of  
4 California and am admitted to practice before this Court. The matters set forth herein are of my  
5 own personal knowledge, and if called as a witness to testify, I could and would testify to these  
6 matters. I submit this declaration in support of Google's Opposition to Plaintiffs' Motion *in Limine*  
7 No. 10 filed concurrently herewith.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts of the final  
9 transcripts available through August 24, 2025.

10 3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts of the rough trial  
11 transcript from August 25, 2025.

12 4. At 4:17 PM on Monday, August 25, Plaintiffs' counsel emailed counsel for Google  
13 to inform them that they are "unlikely to call Bruce Schneier" despite both sides' awareness that  
14 Google would start putting on witnesses on Tuesday.

15 I declare under penalty of perjury under the laws of the State of California and the United  
16 States of America that the forgoing is true and correct.

17 Executed on August 26, 2025 at San Francisco, California.

20 /s/ Chelsea Hu

21 Chelsea Hu

22 322080475